January 5, 2009

LU-9J

Mr. Michael L. Mott
Manager
Environmental, Safety & Occupational Health Office
DLA Enterprise Support-Columbus (DES-CE)
P.O. Box 3990
Columbus, OH 43218-3990

Re: RCRA Corrective Action
Defense Supply Center Columbus
OH6210020222

Dear Mr. Mott:

The U.S. Environmental Protection Agency (U.S. EPA) has reviewed the September 15, 2004, Environmental Baseline Survey (EBS) for the Defense Supply Center in Columbus, Ohio (DSCC), which was received on August 22, 2008. Based on our review of the EBS and the information previously submitted by DSCC on the environmental status of the numerous Solid Waste Management Units (SWMUs) at this facility, it would appear that corrective measures have been successfully implemented at most of those SWMUs, in particular with respect to the removal of contaminated soils. However, EPA has also identified several corrective action issues that require further discussion and/or clarification. Our detailed review comments have been enclosed with this letter. A response to these comments is due on or before February 25, 2009.

EPA's main environmental concern regarding the DSCC facility is the lack of current groundwater data. DSCC must provide additional groundwater monitoring data to verify that contaminated groundwater has remained within the horizontal and vertical dimensions of the existing area of contamination. If contaminated groundwater is likely to discharge into surface water, DSCC will have to verify that the discharge is currently acceptable. [See the Documentation of Environmental Indicator Determination form for Migration of Contaminated Groundwater Under Control, Code CA 750.]

DSCC must address all the necessary requirements delineated in the enclosed comments.

If you have any questions concerning this letter, please contact me at (312) 886-0990.

Sincerely,

Juana E. Rojo
Corrective Action Project Manager
Remediation and Reuse Branch

Enclosure

Review Comments on Corrective Action Documents
Defense Supply Center Columbus
OH6210020222

1. Additional information is needed to supplement the information that was provided by DSCC in the "Status/Remedial Action Taken" section of Table 1 of the 2004 Environmental Baseline Survey (EBS) and the Current Condition Reports of 2003 and 2004. The updated version of the Current Conditions Report should reference the reports, or at a minimum, the most recent documentation, which would support the conclusions for each of the Solid Waste Management Units (SWMUs) and/or areas of concern (AOCs), as applicable (e.g., current status and specific remedial action(s) taken for each of the SWMUs and AOCs at the facility). For instance, the February 2003 Current Conditions Reports indicate that several SWMUs will be demolished (e.g., SWMU 1, 2, 11, 12, 13, 52, etc.), other SWMUs "no longer exist", based on DSCC statements; however, no further information is provided. Also for SWMUs that were not remediated under the guidance of BUSTR (e.g., SWMUs 24, 27, etc.) the reports do not provide specific information. Furthermore, SWMUs such as 67, 69, 72, which may have impacted the Mason Run sediments should be discussed in more specific detail. EPA's suggestions for a limited sampling effort for the Mason Run sediments were transmitted to DSCC on June 12, 2008.

2. Some areas at the DSCC facility where releases have occurred were identified as "sites" in most of the reports that have been submitted to EPA. Based on some of those reports it would appear that there is a greater number of SWMUS and/or AOCs than those identified by EPA in the 1989 RCRA Facility Assessment (RFA) and by DSCC in its current-conditions reports. The areas covered by some of those sites appear to be more extensive that the actual areas where the SWMUs were located and subsequently investigated and/or remediated. DSCC should clearly identify what SWMUs and AOCs are included within those sites, and again, reference the latest cleanup reports for those sites/SWMUs. This information will serve to properly identify all the areas of the facility that may require follow-up sampling and/or remedial actions. Without this information, it is extremely difficult to assess completion of corrective actions at this facility.

DSCC should provide, in particular, information on those sites for which TERRAN recommended remedial actions and monitoring. On Table 20 of the May 20, 1993 Risk Assessment report prepared by TERRAN for DSCC, specific recommendations are included for sites 3 through 15. Prominent among TERRAN's concerns were the conditions at sites 6 and 9. At these sites, the concentrations of BTEX (Benzene, Toluene, Ethylbenzene, Xylenes) in both groundwater and soil exceeded the soil and groundwater BUSTR action levels. At site 6 the contaminant concentrations of concern in the groundwater also included trichloroethylene (TCE) and lead. At site 9 benzene and xylenes were found at significant concentrations. Benzene was detected in groundwater at levels above its MCL.

3. DSCC must adequately define the degree and (current) extent of groundwater contamination, and soil contamination if applicable, at the existing (and any recently discovered) SWMUs and/or AOCs at the facility.

4. DSCC must provide sufficient information to determine if any migration of contaminated groundwater is currently under control. Specifically, DSCC should provide sufficient information to demonstrate that the plume(s) of contamination at the facility is (are) in fact stable or decreasing. EPA will then evaluate the groundwater monitoring results to determine the next steps in the groundwater evaluation process. Additional monitoring and measurement data may have to be collected in the future as necessary to verify that migration of any contaminated groundwater at or from the facility is stabilized. [Note, stabilization of the plume(s) of contaminated groundwater may require implementation of further corrective action measures at the facility.]

5. Corrective measures at this facility must also address all other applicable exposure pathways in addition to soil and groundwater, which could impact human health and/or the environment (e.g., surface soil, sediments, indoor/outdoor air).